



November 30, 2001

Mr. Andrew Stephens
Director for Steel Trade Policy
Office of the U.S. Trade Representative
600 17TH Street N.W.
Washington, D.C. 20508

Dear Mr. Stephens:

I am the President of V/R Tubular Products, INC. An Illinois company that supplies tubular steel products, including shells for ammunition for the U.S. Government. I respectfully request that you consider our request for the exclusion of two products from any remedy imposed on imports of carbon and alloy welded tubular products (other than oil country tubular goods). Although we understand that the deadline established by USTR for these comments had expired. We ask your indulgence in this matter because we were unaware of the deadline, or even that there was an opportunity to submit comments, until the deadline had already passed.

Indeed, we only became aware that these products were under consideration for possible trade action after we submitted an order to our supplier. Our supplier informed us that these products were covered by the section 201 investigation and that imports could be restricted if the President decides to impose measures to protect the U.S. pip and tube industry. As discussed further below, the imported products the V/R Tubular purchases are not manufactured in the United States, so importing them cannot cause injury to the U.S. Industry.

1. Product Description

V/R Tubular product requests exclusion of products with the following specifications:

*0.7990" outside diameter, 0.6420" inside diameter, A513 type 5 DOM, 1020 carbon, 90 ksi minimum tensile strength - See attached inspection certification. Exhibit #1 – confidential

* 4.774" outside diameter, 4.55" inside diameter, A513 type 6 DOM. See attached inspection certification. Exhibit #2 - Confidential

The U.S. tube industry does not produce like or competitive products because U.S. mills cannot meet the specification of either of these products, and thus V/R Tubular Products is unable to purchase these products in the United States. The latter product is used for making shells for ammunition for the U.S. Government. (See enclosed regrets from U.S. Mills-confidential)

P.O. Box 29, Deerfield, Illinois, 60015-0029. (847) 374-9960
Outside Illinois: (800) 323-3772. FAX (847) 374-9963

Steel, Aluminum, and Stainless Tubing
Chrome Plated Bars

This merchandise is classified under HTS SUBHEADING 7306.30.5015. The ASTM classifications for these products are A-513 Type 5 DOM and A513 Type 6 DOM.

Any remedy imposed on these products could ultimately adversely impact our customer, Nomura Enterprises, in supplying ammunition casings to the U.S. Government.

Accordingly, we respectfully request that the President exclude the above described products from any remedy imposed.

Thank you for your consideration.

Sincerely,

Virgil Reginato
President

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